

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**BARBARA LODER HILDEBRANDT, )**

**Plaintiff,**

**VS.**

**Case No. C-1-02 0003**

**HYATT CORPORATION, et al.**

**Judge Sandra Beckwith**

**Defendants.**

### ITEMIZATION OF BILL OF COSTS

## I. Deposition Materials

### A. Court Reporter Appearance/Transcription Fees

<u>No.</u>	<u>Date of Invoice</u>	<u>Deposition Date</u>	<u>Deponent</u>	<u>Exhibit</u>	<u>Cost</u>
1.	4/25/02	4/16/02	Catherine A. Petz	1	\$140.00
2.	4/25/02	4/16/02	Douglas A. Patrick	1	\$277.50
3.	4/25/02	4/16/02	Bruce Small	1	\$160.00
4.	4/25/02	4/16/02	Jeanne Pearson (includes exhibits)	1	\$117.40
5.	4/25/02	4/17/02	Tyson W. Helms	2	\$807.00
6.	4/26/02	3/19/02	B. Hildebrandt	3	\$1,692.20
7.	10/01/02	3/20/02	Brian Booth	4	\$386.80
8.	10/01/02	3/21/02	Jack Horne	5	\$400.80
9.	10/17/02	9/23/02	Dean D'Anna	6	\$854.50
10.	10/17/02	9/23/02	Mary Rocereto	6	\$1,295.75
11.	10/17/02	9/24/02	Dean D'Anna/Vol. 2	7	\$1,293.75

Chicago 48195.1

12.	10/17/02	9/24/02	Wendy Aylward	7	\$877.50
13.	10/17/02	9/25/02	Dawn Beagle	8	\$1,226.50
14.	3/18/03	2/20/03	Leo Hildebrandt, Jr.	9	\$144.50
15.	1/6/04	12/18/03	B. Hildebrandt	10	\$158.76
16.	4/14/04	3/22/04	George E. Parsons, Ph.D.	11	\$390.00
17.	5/3/04	4/7/04	Harvey S. Rosen, Ph.D.	12	\$425.40
18.	5/12/04	4/22/04	Robert Schnitz	13	\$129.80
			(Schnitz Word Index)	13	\$10.00
19.	5/12/04	4/22/04	Molly Crompton	13	\$264.00
			(Crompton Word Index)	13	\$10.00
20.	7/14/04	5/18/04	David Berins	14	\$167.10

**B. Videography**

<u>No.</u>	<u>Date of Invoice</u>	<u>Date of Deposition</u>	<u>Deponent</u>	<u>Exhibit</u>	<u>Cost</u>
1.	3/26/02	3/19/02	B. Hildebrandt	15	\$105.00
2.	3/26/02	3/20/02	Brian Booth	15	\$70.00
3.	3/26/02	3/21/02	Jack Horne	15	\$70.00
<b>Sub-total (for Depositions Materials):</b>					<b>\$11,474.26</b>

**II. Official Court Transcripts**

<u>No.</u>	<u>Date</u>	<u>Description</u>	<u>Pages</u>	<u>Cost/Page</u>	<u>Exhibit</u>	<u>Total</u>
1.	1/28/03	Hearing before the Honorable Jack Sherman, Jr., Magistrate Judge	22	\$0.75	16	\$16.50
2.	7/23/04	Final Pretrial Conference before the Honorable Judge Beckwith	71	\$4.40	17	\$312.40
3.	8/6/04	Hearing on Judge Beckwith's Ruling on Motions in Limine	15	\$4.40	18	\$66.00
4.	8/10/04- 8/11/04	Testimony of Jack Horne; The Court's Ruling on Defendants' Rule 50 Motion; Testimony of Barbara L. Hildebrandt	57;6; 127	\$5.50; \$5.50; \$1.10	19	\$486.20
5.	8/9/04- 8/10/04	Opening Statement of Theresa M. Gallion; Continued Cross-Examination in the Testimony of Jack Horne	42;39	\$1.10; \$5.50	20	\$260.70

**Sub-total (for Official Court Transcripts): \$1,141.80**

**III. Expert Witness Fees**

<u>No.</u>	<u>Date</u>	<u>Description</u>	<u>Exhibit</u>	<u>Amount</u>
1.	1/24/03	Berins & Co., LLC Retainer Fee	21	\$15,000.00
2.	2/03-3/03; 2/04	D. Berins Professional Fees (12.5 hrs) D. Berins Professional Fees (29.0 hrs)	22	\$800.97 (net of retainer)
3.	5/31/04	D. Berins Professional Fees (9.0 hrs)	23	\$3,445.22
4.	6/1/04- 8/12/04	D. Berins Professional Fees (26.25 hrs)	24	\$9,843.75

**Sub-total (Expert Witness Fees): \$29,089.94**

**IV. Photocopying Fees****A. Document Production**

<u>No.</u>	<u>Date</u>	<u>Description</u>	<u>Exhibit</u>	<u>Cost</u>
1.	3/14/02	CopyPLEX Invoice (documents produced by Plaintiff)	25	\$145.59
2.	3/14/02	CopyPLEX Invoice (documents produced by Plaintiff)	26	\$280.01
3.	3/18/02	The Presentation Group Invoice (Statistical Information on Personnel Files Produced to Plaintiff)	27	\$181.10
4.	4/18/02	The Presentation Group Invoice (National Sales Force Personnel Files Produced to Plaintiff)	28	\$256.44
5.	4/26/02	The Presentation Group Invoice (Documents Produced to Plaintiff)	29	\$103.63
6.	4/29/02	The Presentation Group Invoice (Documents Produced to Plaintiff)	30	\$151.45
7.	5/2/02	The Presentation Group Invoice (Documents Produced to Plaintiff)	31	\$827.31
8.	5/10/02	Loop Legal Copies Invoice (National Sales Force Personnel Files Produced to Plaintiff)	32	\$2,870.30
9.	5/23/02	Omaha Legal Copies Invoice (National Sales Force Personnel Files Produced to Plaintiff)	33	\$1,247.42
10.	11/6/02	The Presentation Group Invoice (National Sales Force Personnel Files Produced to Plaintiff)	34	\$222.96
11.	11/22/02	The Presentation Group Invoice (Documents Produced to Plaintiff)	35	\$44.84
12.	1/16/03	Waite, Schneider Invoice	36	\$3.42

(Documents Produced by Plaintiff)

13.	4/18/03	The Presentation Group Invoice (Documents Produced to Plaintiff)	37	\$144.25
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**B. Trial Preparation**

<u>No.</u>	<u>Date</u>	<u>Description</u>	<u>Exhibit</u>	<u>Cost</u>
1.	8/2/04	The Presentation Group Invoice (Trial Exhibits)	38	\$2,588.97
2.	7/9/04- 8/3/04	Zagnoli McEvoy Foley LLC (Production of Demonstrative Exhibits)	39	\$3,994.00
3.	7/8/04- 8/6/04	Zagnoli McEvoy Foley LLC (Demonstrative Exhibit Graphic Development/Revisions)	39	\$11,417.50
4.	7/15/04	CXA, Inc. (Copies of Trial Documents for Hyatt Corporate Office in Preparation for Trial)	40	\$207.14

<b>Sub-total (for Photocopying Fees for Document Productions and Creation and Duplication of Trial Exhibits and Demonstrative Aids):</b>	<b>\$24,686.33</b>
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**V. Consultant Fees**

<u>No.</u>	<u>Date</u>	<u>Description</u>	<u>Exhibit</u>	<u>Cost</u>
1.	7/9/04- 8/5/04	Zagnoli McEvoy Foley LLC	39	\$7,956.25
2.	4/1/04- 5/31/04	LECG, LLC	41	\$3,639.75
3.	8/1/04- 8/19/04	LECG, LLC	42	\$695.00

<b>Sub-total (Consultant Fees):</b>	<b>\$12,291.00</b>
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**VI. Witness Fees**

<u>#</u>	<u>Name</u>	<u>Attendance Fee</u> <u>(days in</u> <u>attendance x</u> <u>\$40.00/day)</u>	<u>Airfare</u>	<u>Subsistence</u> <u>Allowances</u> <u>(days in</u> <u>attendance x</u> <u>\$131.00/day)</u>	<u>Misc.</u> <u>Allowances</u> <u>(includes</u> <u>cab fare)</u>	<u>Exh.</u>	<u>Total</u>
1.	Douglas Patrick	\$200.00	\$397.61	\$655.00	\$73.43	43	\$1,326.04
2.	Mark Henry	\$200.00	\$121.41	\$655.00	N/A	44	\$976.41
3.	Bruce Small	\$160.00	\$376.20	\$524.00	\$46.50	45	\$1,106.70
4.	David Berins	N/A (See Expert Witness Professional Fees)	\$1370.70	\$262.00	\$40.00	46	\$1,672.70

**Sub-total (Witness Fees): \$5,081.85**

**VI. Totals**

I.	Sub-total (for Deposition Materials)	\$11,474.26
II.	Sub-total (for Official Court Transcripts)	\$1,141.80
III.	Sub-total (for Expert Witness Fees)	\$29,089.94
IV.	Sub-total (for Photocopying Fees for Document Productions and Creation and Duplication of Trial Exhibits and Demonstrative Aids)	\$24,686.33
V.	Sub-total (for Consultant Fees)	\$12,291.00
VI.	Sub-total (for Witness Fees)	\$5,081.85

**Grand Total: \$83,765.18**